

In The United States District Court  
For the District of Massachusetts

OFFICE OF  
ATTORNEY GENERAL

NOV 16 2005

RECEIVED  
CORRECTION UNIT

James L. Lee

Plaintiff

v.

David Holman

et. al,

Defendants

CASE # NO: 04-1328-GMS

Plaintiff's Request for interrogatories

Plaintiff's Request for interrogatories

Pursuant to F.R.C.P. 26 and 33, of the federal Rules of Civil procedure, Pursuant To The Appropriate F.R.C.P. and all other case authorities. The plaintiff Request for the Defendants' answer in writing and under oath the following interrogatories within (30) days of service

1. State the Duties of Defendant Mr. David Holman, Mr. Lawrence Mcgehee, Mr. Clyde D. Sagers as they pertain to inmates care, health, safety
2. State the Duties of Defendants SPCA as they pertain to responding to and monitoring inmate grievances and emergency medical grievances
3. State the names, titles and duties of all Staff members at the Revere Correctional center who have responsibility for monitoring and assessment of classification housing and placement and requests to be Relocated if moved to another cell

of C.I.S. pay and all citations filed against David Holmes. Considerate  
negotiator, Clyde D. Rogers w/ the Delawore correctional center, mandatory  
condition of confinement, failure to Picket

5. List any and all past litigation(s) that resulted in any  
consent decree and or favorable outcome for inmate plaintiffs, whether  
published or not published, which involve condition of confinement, and  
Emergency medical grievances and medical treatment issues.
6. Please identify all positions, and titles, with corresponding date of  
employment. That you have held as an employee at Delawore correctional  
center. Describe your job responsibility for each position and title.
7. Please describe in as much detail as possible. The training you have  
received while working at Delawore correctional center for assessing inferences  
with regard to inmate health or safety pertaining to longstanding threats of  
bodily harm including but not limited to emergency situations.
8. Please describe in as much detail as possible, any policy, procedure, and  
practice that governs the procedure for serious medical needs, at Delawore  
correctional center.

9. Please identify all officials responsible for formulating, implementing, and monitoring compliance with policies, procedures, and practices described in your response to interrogatory # 3
10. please describe in as much detail as possible The Circumstances Surrounding your policies and procedures Against Plaintiff  
DA - 1-32-04
11. Please State the name, affiliation, Title (last known address) and last known telephone number of each person who has knowledge of any of the facts stated in your response to interrogatory # 10
12. Please describe in as much detail as possible Policy, procedure and practice that governs The Sick call for serious medical needs at Detroit Correctional Center
13. Please identify each document as the term is defined in F.R.C.P. 34(E)(2). That evidence, mentions or refers to any of the facts stated in your response To interrogatory # 10
14. Please identify each person known to you and not otherwise identified in your answer to these interrogatories who has provided any information or assistance of whatever nature of description relating to any of your answers To these interrogatories

13. Please identify each person who has made to you sworn or unsworn statements or provided information for affidavits or statements that relate to the allegations made in plaintiff's complaint and state the information provided.

Plaintiff James Hall does hereby swear and certify under  
penalty of perjury that the instant Discovery Request is  
not improperly motivated, and not unreasonably burdensome or expensive.

Plaintiff seeks pro Se pleading leave under  
James v. Kerner 404 U.S. 519 (1972)

James Hall

James Hall pro se 167551

1151 Rockwell Rd Sargent GA 31632

11-9-05

Date